

Law Office of Stephen H. Osborne, Ltd.
STEPHEN H. OSBORNE, ESQ.
Nevada Bar No. 4721
232 Court Street, Reno, NV 89501
Phone : (775) 789-4944
Fax : (775) 322-5484
Stephen@stephenosbornelaw.com

Doyle Law Office, PLLC
ROGER S. DOYLE, ESQ.
Nevada Bar No. 10876
KERRY S. DOYLE, ESQ.
Nevada Bar No. 10866
4600 Kietzke Lane, Ste. I-207
Reno, NV 89502
(775) 525-0889
admin@rdoylelaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE ESTATE OF JILL ANN ESCHE; SIERRA
JILL WOFFORD by and through her guardian ad
litem WAYNE WOFFORD; and CAMRON
SCOTT ESCHE,

Plaintiffs,

v.

RENOWN REGIONAL MEDICAL CENTER;
MARTA J. BUNUEL-JORDANA, MD;
CAROLINE VASENDIN, MD, JOHANNA
GRUEN, PhD; EARLE OKI, MD; MAEGEN
SMITH, RN; CAITLIN E. HERSCHEL, RN; and
DOES I-X,

Defendants.

Case No. 3:21-cv-00520-MMD-CLB

STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
(SECOND Request)

COME NOW, Plaintiffs THE ESTATE OF JILL ANN ESCHE; SIERRA JILL WOFFORD
by and through her guardian ad litem WAYNE WOFFORD, and CAMRON SCOTT ESCHE, and
Defendant EARLE OKI, MD, by and through the undersigned counsel, stipulate to further extend the
time to respond to the Motion to Dismiss (ECF No. 18), filed February 7, 2022. A response is currently
due February 28, 2022, pursuant to a stipulation to extend time. A further extension is necessary as the
parties are currently discussing possible resolution of the motion which may make the motion and

1 opposition unnecessary. The parties agree to extend the time to respond by one additional week, until
2 March 7, 2022.

3 **DATED** this 25th day of February, 2022.

DATED this 25th day of February, 2022.

4 DOYLE LAW OFFICE, PLLC

LEMONS, GRUNDY & EISENBERG

5 By: /s/ Kerry S. Doyle

By: /s/ Alice Campos Mercado

6 Law Office of Stephen H. Osborne, Ltd.

Edward J. Lemons

7 Stephen H. Osborne, Esq.

Nevada SBN 699

8 Nevada Bar No. 4721

Alice Campos Mercado, Esq.

9 232 Court Street, Reno, NV 89501

Nevada SBN 4555

10 Phone : (775) 789-4944

6005 Plumas Street

11 Fax : (775) 322-5484

Reno, Nevada 89519

12 Stephen@stephenosbornelaw.com

(775) 786-6868

13 Doyle Law Office, PLLC

Attorneys for Earle Oki, MD

14 Roger S. Doyle, Esq.

15 Nevada Bar No. 10876

16 Kerry S. Doyle, Esq.

17 Nevada Bar No. 10866

18 4600 Kietzke Lane, Suite I-207

19 Reno, Nevada 89502

20 (775) 525-0889

21 Attorneys for Plaintiffs

22 **IT IS SO ORDERED NUNC PRO TUNC.**

23 By: 
24 **UNITED STATES DISTRICT JUDGE**

25 **DATED:** 4/13/2022

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the DOYLE LAW OFFICE, PLLC or the LAW OFFICE OF STEPHEN H. OSBORNE, LTD., and that on the date below, I caused a true and correct copy of the above document to be served on all registered parties listed below by delivery via electronic means (CM/ECF, fax, eflex, NEF, etc.):

DOMINIQUE A. POLLARA
Nevada SBN 5742
POLLARA LAW GROUP
100 Howe Avenue, Suite 165N
Sacramento, California 95825
(916) 550-5880 - telephone
(916) 550-5066 - fax
Email: dp@pollara-law.com

Attorneys for Defendants RENOWN REGIONAL MEDICAL CENTER, MARTA J. BUNUEL-JORDANA, M.D., CAROLINE V ASENDIN, M.D., JOHANNA GRUEN, Ph.D., MAEGEN SMITH, RN and CAITLIN E. HERSCHEL, RN

Edward J. Lemons
Nevada SBN 699
Alice Campos Mercado, Esq.
Nevada SBN 4555
6005 Plumas Street
Reno, Nevada 89519
(775) 786-6868

Attorneys for Defendant EARLE OKI, MD

DATED this 25 February 2022.

By _____/s/ Kerry S. Doyle